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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	:
CELSIUS NETWORK LLC, et al.,	: Case No. 22-10964 (MG)
	:
Debtors.¹	: (Jointly Administered)
-----X	

**RESERVATION OF RIGHTS OF
CORE SCIENTIFIC, INC. AND CORE SCIENTIFIC OPERATING
COMPANY REGARDING (I) VOTING DEADLINE AND (II) PLAN
CONFIRMATION OBJECTION DEADLINE FOR JOINT CHAPTER 11 PLAN OF
REORGANIZATION OF CELSIUS NETWORK LLC AND ITS DEBTORS AFFILIATES**

Core Scientific, Inc. and Core Scientific Operating Company (together, “**Core**”) hereby submit this reservation of rights (the “**Reservation of Rights**”) regarding the *Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtors Affiliates* (Docket No. 3319) (as may be revised, amended, modified, or supplemented, the “**Plan**”),² and respectfully state as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

² All terms capitalized but not defined herein shall have the meanings ascribed to them in the Plan.

1. Core is a former counterparty of debtor Celsius Mining LLC (“**Celsius**”) under various hosting service contracts (the “**Celsius Contracts**”). After protracted contractual disputes and litigation, Core and Celsius have reached a global settlement of, among other issues, all claims and disputes related to the Celsius Contracts (the “**Celsius Settlement**”).

2. Core and Celsius have each filed motions seeking approval of the Celsius Settlement in their respective chapter 11 cases.³ Following Court approval of such motions, the parties intend to consummate such settlement in accordance with the terms thereof. However, in the event that the Celsius Settlement is not effectuated for any reason, Core reserves all of its rights, including, but not limited to, with respect to its claims against the Debtors and classification and treatment of such claims under the Plan.

3. In addition, Core hereby elects to opt out of the Third-Party Release under the Plan.

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³ See Debtors’ Motion for Entry of an Order (I) Approving the Settlement by and Among the Debtors and Core Scientific, (II) Authorizing Entry into the Purchase and Sale Agreement, (III) Authorizing Intercompany Transfers with Celsius Mining, and (IV) Granting Related Relief (Docket No. 3474). Core has also filed the Debtors’ Emergency Motion for Order Approving (I) Global Settlement Between Debtors and Celsius, (II) Sale of Cedarvale Facility and Related Assets, (III) Entry into Amended TNMP Contract and Assumption and Assignment of Transferred Contracts and (IV) Granting Related Relief on September 15, 2023 (Core Docket No. 1236).

Dated: September 22, 2023
New York, New York

/s/ Ronit J. Berkovich

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